

# INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



Tyler Encapsulations

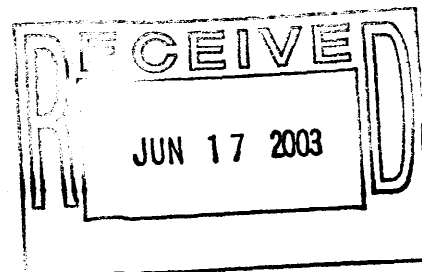


Vitaline Formulas

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June 9, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



## Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Tyler Encapsulations (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Tyler wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name	Statement	Ingredient(s) to which claim refers
Glyco-Kinetic® Complex	"Tyler's Glyco-Kinetic Complex is a selective blend of botanicals, vitamins, trace minerals, amino acids, and glandular extracts designed to provide support for glucose metabolism*."	Vitamin C (as Ascorbic Acid) Thiamine (as Thiamine Hydrochloride) Riboflavin Niacin (as Niacinamide, Niacinol®) Vitamin B-6 (as Pyridoxine Hydrochloride) Folic Acid Vitamin B-12 (as Adenosylcobalamin) Pantothenic Acid (as Calcium Pantothenate) Zinc (as Zinc Picolinate) Selenium (as a Selenium Aspartate Complex) Manganese (as Manganese Aspartate) Chromium (from GlucoChrome®) Pectin Bitter Melon Fruit ( <i>Momordica charantia</i> ) Holy Basil Leaf Extract ( <i>Ocimum tenuiflorum</i> ) L-Methionine L-Alanine Glycine Choline (as Choline Bitartrate)

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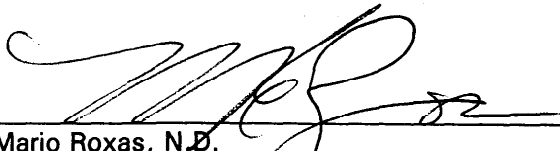
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Product Name	Statement	Ingredient(s) to which claim refers (cont'd)
		Adrenal (Freeze Dried, Bovine)
		Liver (Freeze Dried, Bovine)
		Pancreas (Freeze Dried, Bovine)
		Dandelion Root ( <i>Taraxicum officinale</i> )
		Licorice Root ( <i>Glycyrrhiza glabra</i> ) (8:1 Conc.)
		L-Glutathione, Reduced
		Celandine Aerial Parts ( <i>Chelidonium majus</i> ) (2.3% Alkaloids)

I certify that the information contained in this notice is complete and accurate, and that Tyler has substantiation that the statement is truthful and not misleading.

  
 Mario Roxas, N.D.  
 Director of Technical Services

Date 6/9/03

# INTEGRATIVE THERAPEUTICS INC.



NF Formulas



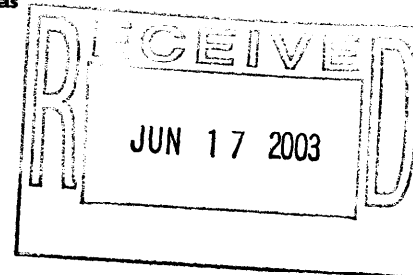
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Product Name	Statement	Ingredient(s) to which claim refers
Glyco-Kinetic® Complex	"Glucose homeostasis depends on the proper function and interaction of several physiologic systems. The nutrients in Glyco-Kinetic Complex supply key coenzymes and mineral catalysts*."	Vitamin C (as Ascorbic Acid) Thiamine (as Thiamine Hydrochloride) Riboflavin Niacin (as Niacinamide, Niacinol®) Vitamin B-6 (as Pyridoxine Hydrochloride) Folic Acid Vitamin B-12 (as Adenosylcobalamin) Pantothenic Acid (as Calcium Pantothenate) Zinc (as Zinc Picolinate) Selenium (as a Selenium Aspartate Complex) Manganese (as Manganese Aspartate) Chromium (from GlucoChrome®) Pectin Bitter Melon Fruit ( <i>Momordica charantia</i> ) Holy Basil Leaf Extract ( <i>Ocimum tenuiflorum</i> ) L-Methionine L-Alanine Glycine Choline (as Choline Bitartrate)

Product Name	Statement	Ingredient(s) to which claim refers (cont'd)
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		Liver (Freeze Dried, Bovine)
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